

CLEMENT SETH ROBERTS (SBN 209203)
croberts@orrick.com
BAS DE BLANK (SBN 191487)
basdeblank@orrick.com
ALYSSA CARIDIS (SBN 260103)
acaridis@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105-2669
Telephone: +1 415 773 5700
Facsimile: +1 415 773 5759

SEAN M. SULLIVAN (pro hac vice)
sullivan@ls3ip.com
MICHAEL P. BOYEA (pro hac vice)
boyea@ls3ip.com
COLE RICHTER (pro hac vice)
richter@ls3ip.com
LEE SULLIVAN SHEA & SMITH LLP
656 W Randolph St., Floor 5W
Chicago, IL 60661
Telephone: +1 312 754 0002
Facsimile: +1 312 754 0003

Attorneys for Sonos, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION

GOOGLE LLC,

Plaintiff and Counter-defendant,

v.

SONOS, INC.,

Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF CLEMENT
ROBERTS IN SUPPORT OF SONOS,
INC.'S ADMINISTRATIVE MOTION
TO FILE UNDER SEAL RE ITS
OPPOSITION TO GOOGLE'S
MOTIONS FOR SUMMARY
JUDGMENT**

I, Clement Roberts, declare as follows and would so testify under oath if called upon to do so:

1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good standing of the Bar of the State of California. I make this declaration based on my personal knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set forth herein.

2. I make this declaration in support of Sonos’s Administrative Motion to File Under Seal in connection with Sonos, Inc.’s Opposition to Google’s Motions for Summary Judgment (“Sonos’s Opposition”).

3. Sonos seeks an order sealing the materials as listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Exhibit I	Portions in red boxes	Sonos
Exhibit K	Portions in red boxes	Sonos

4. The portions of Exhibits I and K outlined in red boxes reference and contain Sonos’s confidential business information and trade secrets, including source code, and details regarding the architecture and technical operation of various products and research and development processes. The specifics of how these functionalities and processes operate is confidential information that Sonos does not share publicly. A less restrictive alternative than sealing the portions of Exhibits I and K to Sonos’s Opposition, as indicated in the table above, would not be sufficient because the information sought to be sealed is Sonos’s confidential business information and trade secrets and is integral to Sonos’s legal arguments.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 21st day of February, 2023 in Belevedere, California.

/s/ Clement S. Roberts

Clement Seth Roberts